

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

SUZANNE BOELTER, individually and on  
behalf of all other similarly situated,

Plaintiff,

vs.

HEARST COMMUNICATIONS, INC.,

Defendant.

Civil Action No. 15-cv-03934-AT-JLC

**ORAL ARGUMENT REQUESTED**

**NOTICE OF MOTION FOR A TEMPORARY STAY OF DISCOVERY PENDING  
THE RESOLUTION OF DEFENDANT'S MOTION TO DISMISS**

**PLEASE TAKE NOTICE** that upon the accompanying Memorandum of Law, dated September 10, 2015, Defendant Hearst Communications, Inc., through its undersigned attorneys, will move this Court, before the Honorable Analisa Torres, United States District Court Judge, Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, for an Order, pursuant to Federal Rule of Civil Procedure 26(c), granting it's motion for a temporary stay of discovery in the above-captioned action pending resolution of Defendant's motion to dismiss, and for such other and further relief as may be just and proper.

Dated: September 10, 2015

Respectfully submitted,

/s/ Jonathan R. Donnellan

Jonathan R. Donnellan

Kristina E. Findikyan

Stephen H. Yuhan

HEARST CORPORATION  
Office of General Counsel  
300 West 57th Street  
New York, New York 10019-3792  
Phone (212) 841-7000  
Fax (212) 554-7000  
[jdonnellan@hearst.com](mailto:jdonnellan@hearst.com)

*Attorneys for Defendant Hearst  
Communications, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 10, 2015, a true and correct copy of the foregoing was filed electronically on the Court's electronic filing system, and notice of this filing will be sent to all registered parties by operation of same.

By: /s/ Jonathan R. Donnellan  
Jonathan R. Donnellan